

UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT

AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT

I, Brittany Prue, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Deputy United States Marshal with the United States Marshals Service (“USMS”) and have been employed with the USMS since June of 2016. I have participated in investigations of fugitives and, among other things, have conducted or participated in surveillance, the execution of arrest and search warrants, and debriefings of informants. Through my training, education, and experience, I have become familiar with the manner in which fugitives or targets of criminal investigations utilize resources, including cellular telephones and social media platforms, to communicate while avoiding detection by law enforcement. I participated in investigations where fugitives flee the state where they are wanted in order to avoid prosecution.

2. I have been assigned as the lead investigating Deputy U.S. Marshal (DUSM) who is investigating the whereabouts of fugitive Matthew CHAMPAGNE. CHAMPAGNE is a fugitive from a Vermont state warrant issued on November 4, 2021 by a Vermont Superior Court Judge in Orleans County for Second Degree Attempted Murder, in violation of 13 VSA 2301, First Degree Aggravated Domestic Assault with a Weapon, in violation of 13 VSA 1043 (a)(2), Aggravated Assault with a deadly weapon, in violation of 13 VSA 1024 (a)(5), and Reckless Endangerment, in violation of 13 VSA 1025.

3. I make this affidavit in support of a Criminal Complaint charging MATTHEW CHAMPAGNE with violating Title 18, United States Code 1073, Unlawful Flight to Avoid Prosecution.

4. In preparation of this affidavit, I have relied on my personal observations, and on information provided by other Law Enforcement officials, including officers with the Newport, Vermont Police Department (NPD) who investigated CHAMPAGNE's underlying state crime. This affidavit was written to establish probable cause and does not contain all facts known to me about this case.

PROBABLE CAUSE

5. On November 4, 2021, an arrest warrant was issued by the Vermont Superior Court, Orleans Unit, Criminal Division, for the arrest of Matthew CHAMPAGNE for the charges of Second Degree Attempted Murder, in violation of 13 VSA 2301, First Degree Aggravated Domestic Assault with a Weapon, in violation of 13 VSA 1043 (a)(2), Aggravated Assault with a deadly weapon, in violation of 13 VSA 1024 (a)(5), and Reckless Endangerment, in violation of 13 VSA 1025. The charges related to an incident on October 21, 2021, in which Matthew CHAMPAGNE (hereinafter CHAMPAGNE) apparently lured his brother Joseph Champagne (hereinafter Joseph) to Gardner Park in Newport City and then repeatedly fired a gun at Joseph as Joseph attempted to flee.

6. Through investigative work conducted by the Newport Police Department and the United States Marshals Service, I learned that CHAMPAGNE previously resided in Barton, Vermont for several years. Efforts made by Newport Police to locate CHAMPAGNE since October 21, 2021, have been unsuccessful.

7. According to officers with NPD with whom I have spoken, following the October 21, 2021 shooting incident, on November 2, 2021, Newport Police spoke with Logan Patrick. Patrick is a witness to the shooting. During the conversation, Patrick filled out a signed sworn statement regarding the shooting incident, which I have reviewed. According to NPD, Patrick also told police that he spoke to Matthew CHAMPAGNE on November 1, 2021, when CHAMPAGNE went to Patrick's father's residence. At that time, CHAMPAGNE told Patrick that he was going home, which Patrick believed to mean that he was heading back down to Connecticut since the last time CHAMPAGNE went to Connecticut he referred to that as "home."

8. On December 7, 2021, Deputy U.S. Marshals (DUSMS) Prue, Rice and Supervisory Deputy U.S. Marshal (SDUSM) Curtis from the District of Vermont, interviewed Jayme Champagne (hereinafter (Jayme), adoptive mother of Matthew CHAMPAGNE and his two other biological brothers. Jayme said she was forced to leave their former home in Connecticut due to the children's ongoing behavioral issues. Jayme told DUSMS that CHAMPAGNE has many mental health concerns including ADHD and anger issues. She does not believe CHAMPAGNE is currently taking his prescribed medications for those mental health issues. Jayme told DUSMS that CHAMPAGNE sells marijuana for money as he is currently not employed. Jayme told DUSMS that her last contact with CHAMPAGNE was on October 25, 2021, via Facebook. At that time, CHAMPAGNE told Jayme he was in Massachusetts. Jayme told DUSMS she is 100% certain her son fled the State of Vermont following the shooting on October 21, 2021.

9. According to Jayme, CHAMPAGNE utilizes multiple Facebook pages. Jayme told DUSMS that his current Facebook page is under the name "Haze." Jayme stated

CHAMPAGNE utilizes Facebook as his primary source of communication. Jayme stated CHAMPAGNE knows he is wanted by police and according to Jayme, he will run because “that’s what Matthew does.” According to his criminal record, CHAMPAGNE has former police involvements to include evading Law Enforcement Officers. Jayme’s younger daughter told DUSMS over a phone call with Jayme and DUSMS that she last spoke with CHAMPAGNE the morning of December 7, 2021 and CHAMPAGNE was in New York. Jayme told DUSMS she knows her son carries a firearm on his person.

10. On December 10, 2021, DUSMS from the Western District of New York, with whom I have spoken, interviewed Susan Hanscome at her residence in Hornell, NY. Hanscome is CHAMPAGNE’s biological mother. Hanscome told DUSMS that she has not seen CHAMPAGNE, nor has she heard from him, since the shooting occurred in October. Hanscome told DUSMS that she believes CHAMPAGNE is in Waterbury, CT or New York City. Hanscome was basing her opinions from Facebook posts which she had seen. Hanscome attempted to locate the Facebook posts but was unsuccessful. Hanscome told DUSMS that CHAMPAGNE is known to hang out with gang members.

11. On December 15, 2021, I spoke with Jayme on the phone. Jayme indicated CHAMPAGNE told her that he was in Philadelphia, PA with his cousin, Christopher Champagne at that time. Christopher has an active Silver Alert in the State of Connecticut for being a missing child. According to Jayme, CHAMPAGNE and Christopher are stealing vehicles and traveling to different states to include NY and PA. Jayme also told me that she believes another missing child, a female, is traveling with them. Jayme said CHAMPAGNE is now utilizing the Facebook page with name “Frank Lucas.” Jayme stated CHAMPAGNE told her that he led police on a chase while driving down a one-way road in Philadelphia but got away. Jayme

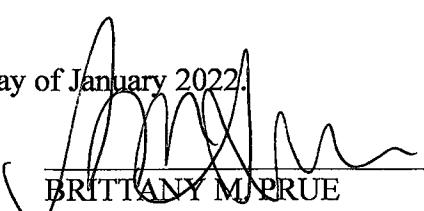
stated she believes CHAMPAGNE and Christopher may travel to CT to visit other family members and friends.

12. On December 20, 2021, the extradition parameters for CHAMPAGNE's state warrant were updated to allow his extradition from all of US.

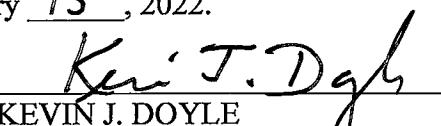
CONCLUSION

13. Based upon the information set forth above, I submit there is probable cause to believe that Matthew CHAMPAGNE has traveled interstate and that he has done so with the intent to avoid prosecution in Vermont, in violation of 18 U.S.C. §1073, Unlawful flight to avoid prosecution.

Dated at Burlington, Vermont, this 13th day of January 2022.


BRITTANY M. PRUE
Deputy U.S. Marshal

Subscribed and sworn to before me on January 13th, 2022.


KEVIN J. DOYLE
United States Magistrate Judge
District of Vermont